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UBER TECHNOLOGIES, INC.
and OTTOMOTTO LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

WAYMO LLC,

Plaintiff,

v.

UBER TECHNOLOGIES, INC.,
OTTOMOTTO LLC; OTTO TRUCKING LLC,

Defendants.

Case No. 3:17-cv-00939-WHA

**DEFENDANTS UBER
TECHNOLOGIES, INC. AND
OTTOMOTTO LLC'S
ADMINISTRATIVE MOTION TO
FILE UNDER SEAL THEIR
OPPOSITION TO WAYMO'S
MOTION TO COMPEL STROZ-
RELATED DISCOVERY**

Pursuant to Civil Local Rules 7-11 and 79-5, Defendants Uber Technologies, Inc. and Ottomotto LLC (“Defendants”) submit this motion for an order to file under seal portions of their Opposition to Waymo’s Opposition to Waymo’s Motion To Stroz-Related Discovery. Specifically, Defendants request an order granting leave to file under seal the confidential portions of the following documents:

Document	Portions to Be Filed Under Seal	Designating Party
Exhibit C	Highlighted Portions	Defendants (Blue)
Exhibit L	Highlighted Portions	Plaintiff (Green)

The blue-highlighted portions of Exhibit C to the Rivera Declaration contain confidential personal information of a certain employee. Defendants request this information be kept under seal to protect individual privacy interests because this lawsuit is currently the subject of extensive media coverage. Disclosure of this information could expose this individual to harm or harassment. (Yang Decl. ¶ 3.)

The green-highlighted portions of Exhibit L to the Rivera Declaration contain information that has been designated “Highly Confidential – Attorneys’ Eyes Only” or “Confidential” by Waymo in accordance with the Patent Local Rule 2-2 Interim Model Protective Order (“Protective Order”), which the parties have agreed governs this case (Transcript of 3/16/2017 Hearing, page 6). Defendants file this material under seal in accordance with Paragraph 14.4 of the Protective Order. (Yang Decl. ¶ 4.)

Pursuant to Civil Local Rule 79-5(d)(2), Defendants will lodge with the Clerk the documents at issue, with accompanying chamber copies.

Defendants served Waymo with this Administrative Motion to File Documents Under Seal on October 17, 2017.

For the foregoing reasons, Defendants request that the Court enter the accompanying Proposed Order granting Defendants’ Administrative Motion to File Documents Under Seal and designate the service copies of these documents as “HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY.”

1 Dated: October 17, 2017

MORRISON & FOERSTER LLP

2 By: /s/ Arturo J. Gonzalez

3 ARTURO J.GONZALEZ

4 Attorneys for Defendants
5 UBER TECHNOLOGIES, INC. and
6 OTTOMOTTO LLC
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